



Connecticut River Coastal Conservation District, Inc.

Comments on Connecticut Department of Environmental Protection's  
Proposed Stream Flow Standards and Regulations

The Connecticut River Coastal Conservation District (CRCCD) would like to offer the following comments concerning the proposed CT DEP Stream Flow Standards and Regulations. CRCCD represents a broad spectrum of interests with respect to our state's water resources. Much of our work is focused directly on protecting and improving water quality, and our Board includes professionals from the water supply industry (municipal and private), water-based recreation/tourism industry, agricultural operations, the corporate sustainability profession, as well as conservation organizations. With that in mind, CRCCD supports a balanced approach to managing the State's rivers and streams that ensures an adequate water supply to maintain base flow in streams and rivers needed to support and sustain healthy aquatic systems, recreation and tourism; and that will meet the long-term drinking water needs of Connecticut residents, water demands for commercial enterprise, and water requirements for agricultural production.

The proposed Stream Flow Standards and Regulations have provided stakeholders an important opportunity to discuss and develop best management approaches that seek to balance both the economic and environmental concerns of water supply contributed from rivers and streams. However, we believe more work needs to be done to ensure "balance" is met on both the environmental and economic sides of the equation for protecting all of Connecticut's water supplies. To that end, we recommend the advisory groups be reconvened to work through the concerns raised by all stakeholders. We further recommend the following strategies/management practices for sustaining the quantity and quality of Connecticut's water supplies.

- Promote the use of land use practices that protect groundwater recharge zones and minimize impacts to groundwater hydrology. These should be encouraged strongly, possibly through incentives, by the state and municipalities. The overall cumulative effect of increasing impervious surface areas within the watershed area can negatively impact the recharge capability of aquifers and the base flow of rivers and streams, and degrade water quality through increased storm water runoff.
- Implement broad-based (all stakeholders) water conservation programs to encourage citizens and businesses to participate in the stewardship of what is arguably our most critical natural resource (e.g. similar to energy conservation programs). Water conservation programs to reduce inefficient water use practices are now, for the most part, only promoted during periods of drought.
- Identify funding sources and/or stakeholder incentives to assist with upgrade and maintenance of infrastructure required for long term protection and maintenance of water supply for both environmental and economic purposes. For example deposits from unclaimed water bottles could be used to support the cost of compliance with the proposed Stream Flow Standards and Regulations.

The Connecticut River Coastal Conservation District appreciates all of the work that the DEP and stakeholder advisory groups have accomplished to date, and encourages continued dialogue on the proposed stream flow standards and regulations to ensure that all economic and environmental concerns have been addressed. On behalf of the Board and staff, thank you for your consideration of our comments.

Thomas ODell, Chairman